

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: DAWN ANDRACCHIO : Bankruptcy No. 08-12709BIF
 :
 :
DEBTOR : CHAPTER 7

MOTION TO AVOID LIEN HELD BY JUDGEMENT CREDITOR

Dawn Andracchio, through her attorney, Maria C. Palladino, Esquire, hereby moves this Honorable Court to Avoid a Judicial Lien held by Palisades Collection, LLC, Assignee of Providian National Bank, and Debtor sets forth in support thereof the following:

1. Debtor filed a voluntary Chapter 7 Petition on or about April 25, 2008.
2. This Court has jurisdiction over this motion, filed pursuant to 11 U.S.C. 522(f) to avoid and cancel liens held by respondent.
3. The liens are attached to Debtor's personal property which are currently in Debtor's possession and in use.
4. The property was not purchased with money borrowed from the lien holder.
5. The subject lien, in the amount of \$8,660.20 was created by judicial action.
6. The Debtor's interest in the subject property is encumbered by the judicial lien and has been claimed as fully exempt in his bankruptcy case.

7. The existence of the lien on Debtor's property impairs exemptions to which the Debtor is entitled under 11 U.S.C. 522(b).

WHEREFORE, Debtor requests an Order avoiding and canceling the judicial lien on her personal property and for such additional or alternative relief as may be just and proper.

Respectfully submitted,

s/Maria C. Palladino
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